

I do not support this petition for rule making as stated. While the RAF has more closely attempted to address the commissions stated intent from Docket 98-143, several aspects of the proposal I do not support. First and foremost is the retention of CW for both General and Extra classes in the Amateur Radio service. While I support CW retention for the Extra class I assert that keeping this requirement for both classes is an unnecessary constraint of the "trade space" available to the commission for restructuring the Amateur Radio service. In addition, I do not accept the rationale for some the limitations of privileges proposed for the entry level license in the HF bands.

I do support changes in the VEC testing guidelines - minimum 10 day retest waiting period and multiple versions of test sets used within a 30 day period. However, I am not necessarily in favor of removing the question pool from the public domain.

The proposal does include other concepts that I support including the consolidation of current license system into a three tier structure. However, I am not necessarily convinced that the Technician Class should be retained as the entry level license. This belief stems from both an emotional/legacy perspective (having been originally licensed as a Novice) and from a utilitarian perspective on the evolution of the technician into a license with two sub-classes. I believe that the Technician Class will have reached the end of it's useful "life span" given a reasonable overall restructuring of the service.

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